

REMARKS

Claims 1, 4-5 and 8 are pending in this application. By this Preliminary Amendment, Claims 1 and 5 are amended and Claims 2, 6 and 9-10 are canceled without prejudice or disclaimer. Applicants respectfully submit that no new matter is added herein.

Claim Rejections – 35 U.S.C. §102 and §103

The Office Action dated August 24, 2006 finally rejected Claims 1-2, 4 and 9 under 35 U.S.C. §102(e) as being anticipated by US. Patent Number 6,646,233 to Kanno et al. (Kanno). Claims 5, 6, 8 and 10 were also rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Number 6,771,483 to Harada et al. (Harada) in view of U.S. Patent No. 5,625,526 to Watanabe and Kanno. Applicants respectfully traverse the rejections for the following reasons.

Claims 1 and 5 recite, among other features, a substrate side recess formed on a surface of the dielectric layer (or the first dielectric layer), the surface being located proximate to the feeder terminal portion. A substrate side electrode is provided at the exposed portion of the internal electrode in the substrate side recess so as to be apart from the dielectric layer (or the first dielectric layer) and to project from the substrate side recess to the electrode of the feeder terminal portion. The feeder terminal portion having the electrode and the substrate having the substrate side electrode are removably fixed to each other by mechanical joining. In the mechanical joining, the substrate side electrode is fit into the recess of the feeder terminal portion and contacts the electrode of the feeder terminal portion.

In the present invention, since the feeder terminal portion and the substrate are removably fixed to each other by mechanical joining, the feeder terminal portion is easily removable from the substrate by releasing the mechanical joining therebetween when the dielectric layer (the first dielectric layer) of the substrate needs to be replaced after the electrostatic chuck is produced. In addition, since the substrate side electrode is provided at the exposed portion of the internal electrode in the substrate side recess so as to be apart from the dielectric layer (or the first dielectric layer) and to project from the substrate side recess to the electrode of the feeder terminal portion, and the substrate side electrode is fit into the recess of the feeder terminal portion in the mechanical joining, the substrate side electrode is easily removable from the dielectric layer (or the first dielectric layer) when the dielectric layer (the first dielectric layer) of the substrate needs to be replaced after the electrostatic chuck is produced.

As described above, since the feeder terminal portion is easily removable from the substrate and the substrate side electrode is easily removable from the dielectric layer (or the first dielectric layer), the feeder terminal portion and the substrate side electrode can be reused after the dielectric layer (the first dielectric layer) of the substrate is replaced.

In contrast, in Kanno, as shown in Fig. 7, the substrate side electrode 51, to which the guide 50 of the feeder terminal portion 20 is fixed by mechanical joining, is provided in the dielectric layer 15. However, the feeder terminal portion 20 does not have a recess into which the substrate side electrode 51 is fit upon mechanical joining, and the substrate side electrode 51 is not apart from the dielectric layer 15. Therefore,

the substrate side electrode 51 of Kanno is structurally different from the substrate side electrode of the present invention. As a result, in Kanno, it is difficult to remove the substrate side electrode 51 from the dielectric layer 15, so that the substrate side electrode 51 cannot be reused after the dielectric layer 15 of the substrate is replaced.

In Harada, as shown in Fig. 1, the substrate side electrode 4 is provided between the dielectric layers 3 and 5. However, the substrate side electrode 4 is not apart from the dielectric layers 3 and 5. In fact, the substrate side electrode 4 is embedded in the dielectric layers 3 and 5. Therefore, the substrate side electrode 4 of Harada is structurally different from the substrate side electrode of the present invention. In addition, in Harada, a feeder terminal portion fixed to a substrate by mechanical joining is not provided. As a result, in Harada, the above described actions and effects of the present invention cannot be obtained.

In Watanabe, as shown in Fig. 3, the substrate side electrode 16, which contacts the feeder terminal portion 80, is provided in the dielectric layer 4A. However, the feeder terminal portion 80 does not have a recess into which the substrate side electrode 16 is fit, and the substrate side electrode 16 is not apart from the dielectric layer 4A. Therefore, the substrate side electrode 16 of Watanabe is structurally different from the substrate side electrode of the present invention. In addition, in Watanabe, the feeder terminal portion 80 and the substrate 6 are not fixed by mechanical joining. As a result, in Watanabe, the above described actions and effects of the present invention cannot be obtained.

As described above, Kanno, Harada and Watanabe fail to disclose, teach or remotely suggest each and every one of the claimed features and advantages of the present invention. Therefore, the present invention is not disclosed in Kanno, Harada, and Watanabe, and is not obvious over the combination of Kanno, Harada and Watanabe.

In view of the above, Applicants respectfully submit that Kanno, Harada and Watanabe, alone or in any combination thereof, fail to disclose or suggest each and every feature recited by Claims 1 and 5.

To qualify as prior art, a single reference must teach, i.e., identically disclose, each and every feature recited by a rejected claim.

Furthermore, to establish *prima facie* obviousness, each feature of a rejected claim must be taught or suggested by the applied art of record. See M.P.E.P. §2143.03.

As explained above, Kanno, Harada and/or Watanabe, alone or in combination, do not disclose or suggest each feature recited by Claims 1 and 5. Therefore, Kanno, Harada and/or Watanabe do not anticipate, nor render obvious, the invention recited by Claims 1 and 5.

Accordingly, Applicants respectfully submit Claims 1 and 5 should be deemed allowable over Kanno, Harada and Watanabe.

Claim 4 depends from Claim 1. Claim 8 depends from Claim 5. It is respectfully submitted that these dependent claims be deemed allowable for at least the same

reasons Claims 1 and 5 are allowable, as well as for the additional subject matter recited therein.

Applicants respectfully request withdrawal of the rejections.

Conclusion

Prompt and favorable examination on the merits is respectfully requested.

Should the Examiner believe anything further is desirable in order to place this application in better condition for allowance, the Examiner is requested to contact the undersigned at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension, together with any additional fees that may be due with respect to this paper, may be charged to counsel's Deposit Account No. 01-2300, **referencing docket number 108421-00095.**

Respectfully submitted,
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